

(b) (6), (b) (7)  
(C)

**From:** (b) (6), (b) (7)  
**Sent:** Thursday, July 13, 2017 1:52 PM  
**To:** (b) (6), (b) (7)(C) @csb.gov  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** FW: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

I forwarded this information also. (b) (6)

Special Agent (b) (6), (b) (7)  
Desk Officer for the EPA, OIG Hotline  
US EPA, OIG, Office of Investigations HQ  
1200 Pennsylvania Ave NW Mailcode 2431T  
Washington, DC 20460  
Voice - 202 (b) (6), (b) (7)(C) Cell (b) (6), (b) (7)

Hotline - 202-566-2476 or 888-546-8740  
Hotline Fax 202-566-2599 Web Address [oig\\_hotline@epa.gov](mailto:oig_hotline@epa.gov)

Hotline records are protected under the Privacy Act 5 U.S.C. § 552a. All EPA employees handling protected information have a legal and ethical obligation to hold that information in confidence and to actively protect it from improper uses. Except as specifically authorized, EPA employees shall not disclose, directly or indirectly the contents of any record about another individual to any person or organization. EPA employees who willfully release protected information, without authority, may be guilty of a misdemeanor and fined up to \$5,000. In addition, any employee violating the Privacy Act or EPA regulations is subject to disciplinary action, which may result in dismissal.

**From:** (b) (6), (b) (7)  
**Sent:** Thursday, July 13, 2017 1:41 PM  
**To:** (b) (6), (b) (7)(C) @epa.gov  
**Cc:** (b) (6), (b) (7)(C) @epa.gov; (b) (6), (b) (7)(C) @epa.gov; (b) (6), (b) (7) (b) (6), (b) (6), (b) (7)(C) @epa.gov  
**Subject:** FW: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

See below.

**From:** (b) (6), (b) (7)(C) @csb.gov  
**Sent:** Thursday, July 13, 2017 11:48 AM  
**To:** (b) (6), (b) (7)(C) @epa.gov; (b) (6), (b) (7)(C) @epa.gov  
**Subject:** Fwd: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

Apologies, meant to forward this one but my question remains - to whom may I forward?

**From:** (b) (6), (b) (7)(C) @csb.gov  
**Subject:** Re: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)  
**Date:** 13 July 2017 12:26  
**To:** (b) (6), (b) (7)(C) @csb.gov

(b) (6), (b) (7)(C), (b) (5)

(b) (6), (b) (7)(C), (b) (5)

On: 13 July 2017 12:19, (b) (6), (b) (7)(C) @csb.gov wrote:

(b) (6), (b) (7)(C), (b) (5)

(b)

---

On: 13 July 2017 12:11, (b) (6), (b) (7)(C) <[REDACTED]>@csb.gov> wrote:

(b) (6), (b) (7)(C), (b) (5)

(b)

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On: 13 July 2017 11:51, (b) (6), (b) (7)(C) <[REDACTED]>@csb.gov> wrote:

(b) (5)

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From: (b) (6), (b) (7)(C)  
Sent: Thursday, July 13, 2017 11:36 AM  
To: (b) (6), (b) (7)(C)  
Subject: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

## Trump's EPA cuts less severe under House plan; Chemical Safety Board funding restored

[Scott Fallon](#), Staff Writer, @NewsFallon Published 7:02 p.m. ET July 11, 2017 | Updated 9:56 a.m. ET July 12, 2017



Pollutants released from coal-fired power plants can react in warm air, creating high levels of ground-level ozone on warmer days. Ozone can exacerbate asthma and other respiratory illnesses. (Photo: David J. Phillip, AP)

The severe cuts to the federal Environmental Protection Agency called for by President Donald Trump would be avoided and a federal board that investigates chemical industry accidents would not be eliminated under a House bill released Tuesday.

The Appropriations Committee would cut the EPA's budget by \$528 million instead of the \$2.6 billion requested by the Trump Administration. It would also maintain the \$11 million budget of the Chemical Safety Board, which was founded following the 1995 Napp Technologies explosion in Lodi that killed five workers. But advocates said the EPA cuts and language in the bill supporting Trump's rollback of Obama-era clean water rules will still hurt New Jersey's environment.

"The cuts are less devastating than they could have been, but they are problematic," said David Pringle, of Clean Water Action. "We still need to hear from the Senate and Trump on this. So if this is the high water mark, we're going to be drowning."

The spending plan is largely the work of Appropriations Chairman Rep. Rodney Frelinghuysen, R-Morris County, who has come under criticism for his voting record on environmental legislation especially in recent years.



Rep. Rodney P. Frelinghuysen (Photo: J. Scott Applewhite/AP)

Frelinghuysen said in a statement that the bill continues to fund "programs that protect environmental safety" while reining in "harmful and unnecessary regulations that destroy economic opportunity and hinder job creation."

The bill is an important, but preliminary step towards a final spending plan. The Senate Appropriations Committee still needs to issue its environment bill. If both houses pass their respective bills then there will be a budget conference to reconcile differences. It would then go to the president who can sign or veto. The fiscal year begins Oct. 1.

Frelinghuysen's environmental record has advocates worried with EPA budget looming

Christie administration has no contingency plan for Trump's EPA cuts

Many of EPA's core functions would be kept a level funding. The Superfund cleanup program, for instance, which would retain about \$1.1 billion. Trump wanted to cut the program by 30 percent to the chagrin of many in New Jersey, which leads the nation with 114 Superfund sites. Some of the cuts would come from "buyouts and voluntary separation agreements" with EPA employees.

The bill also supports EPA Administrator Scott Pruitt's call to to withdraw the 2015 "Waters of the United States" rule. Adopted by the Obama administration, it expands the definition of waters subject to federal jurisdiction under the Clean Water Act.

Critics have said the rule so broadly expands EPA's authority that it would be able to regulate ditches and small bodies of water. The EPA finalized the rule in May 2015, but it has been blocked by a federal appeals court pending further legal challenges.



The Napp Technologies general alarm fire, April 21, 1995. (Photo: David F. Adornato/NorthJersey.com file)

The Chemical Safety Board was among several independent government bodies listed for elimination when Trump unveiled his budget proposal in March.

Since the Napp explosion, the board has been at the forefront of examining some of the worst workplace disasters in recent memory, from the Deepwater Horizon oil rig fire in 2010 to the 2013 West Fertilizer explosion in Texas that killed 15 people. In New Jersey, the board has conducted major investigations of chemical fires in Paterson, East Rutherford and Perth Amboy.

Board members and staffers have spent months lobbying for the board's survival. They received bi-partisan support from most of New Jersey's congressional delegation when six Democrats and three Republicans signed a letter in May calling for the board's budget to be fully funded.

(b) (6), (b) (7)(C)

(b) (6), (b) (7)  
(C)

**From:** (b) (6), (b) (7)  
**Sent:** Thursday, July 13, 2017 1:51 PM  
**To:** (b) (6), (b) (7)(C) @csb.gov  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** FW: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

(b) (6), (b) (7), the lobbying complaint was assigned Hotline #2017-0309. It has been forwarded to the EPA OIG Office of Investigations. The information below has been sent to Special Agent (b) (6), (b) (7)(C). Please feel free to contact me directly if you have any further information. Moreover, if you want to report any complaints, I am the person to send them to. Thanks (b) (6)

Special Agent (b) (6), (b) (7)  
Desk Officer for the EPA, OIG Hotline  
US EPA, OIG, Office of Investigations HQ  
1200 Pennsylvania Ave NW Mailcode 2431T  
Washington, DC 20460  
Voice - 202 (b) (6), (b) (7)(C) Cell (b) (6), (b) (7)

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Hotline Fax 202-566-2599 Web Address [oig\\_hotline@epa.gov](mailto:oig_hotline@epa.gov)

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**From:** (b) (6), (b) (7)  
**Sent:** Thursday, July 13, 2017 1:41 PM  
**To:** (b) (6), (b) (7)(C) @epa.gov  
**Cc:** (b) (6), (b) (7)(C) @epa.gov; (b) (6), (b) (7)(C) @epa.gov; (b) (6), (b) (7) @epa.gov  
**Subject:** FW: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

(b) (6)

I'm turning this over to you. I do not know who if anyone in OI is looking into what we referred over so I wouldn't have any idea who to send it to in OI other than you.

(b) (6)

**From:** (b) (6), (b) (7)(C) @csb.gov  
**Sent:** Thursday, July 13, 2017 11:46 AM  
**To:** (b) (6), (b) (7)(C) @epa.gov  
**Cc:** (b) (6), (b) (7)(C) @epa.gov  
**Subject:** Fwd: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)

(b) (6), (b) (7)(C)

I know that the Office of Investigations is now handling the original IG hotline complaint about potential lobbying activities by a board member. I do not know, however, to whom I should forward this email string highlighting a reporter's coverage of CSB's funding situation.

Thanks.

(b) (6),  
(b) (7)

---

From: (b) (6), (b) (7)(C) @csb.gov>  
Subject: Re: CSB Funding Coverage in Record of Bergen County, NJ (scroll down)  
Date: 13 July 2017 12:18  
To: (b) (6), (b) (7)(C) @csb.gov>, (b) (6), (b) (7)(C) @csb.gov>, (b) (6), (b) (7)(C) @csb.gov>  
(b) (6), (b) (7)(C) @csb.gov>

(b) (6), (b) (7)(C), (b) (5)

On: 13 July 2017 11:36, (b) (6), (b) (7)(C) @csb.gov> wrote:

## Trump's EPA cuts less severe under House plan; Chemical Safety Board funding restored

Scott Fallon, Staff Writer, @NewsFallon Published 7:02 p.m. ET July 11, 2017 | Updated 9:56 a.m. ET July 12, 2017

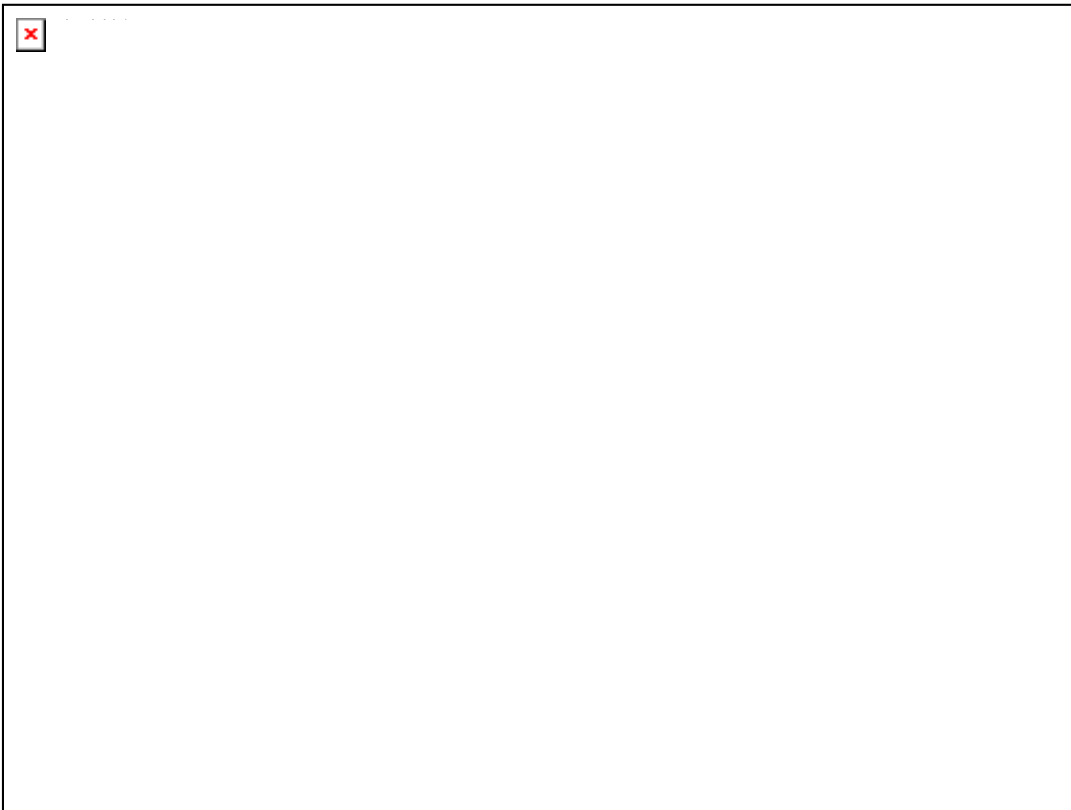
Pollutants released from coal-fire edpower plants can react in warm air, creating high levels of ground-level ozone on warmer days. Ozone can exacerbate asthma and other respiratory illnesses.(Photo: David J. Phillip, AP)

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Rep. Rodney P. Frelinghuysen (Photo: J. Scott Applewhite/AP)

Frelinghuysen said in a statement that the bill continues to fund "programs that protect environmental safety" while reining in "harmful and unnecessary regulations that destroy economic opportunity and hinder job creation."

The bill is an important, but preliminary step towards a final spending plan. The Senate Appropriations Committee still needs to issue its environment bill. If both houses pass their respective bills then there will be a budget conference to reconcile differences. It would then go to the president who can sign or veto. The fiscal year begins Oct. 1.

[Frelinghuysen's environmental record has advocates worried with EPA budget looming](#)

[Christie administration has no contingency plan for Trump's EPA cuts](#)

Many of EPA's core functions would be kept a level funding. The Superfund cleanup program, for instance, which would retain about \$1.1 billion. Trump wanted to cut the program by 30 percent to the chagrin of many in New Jersey, which leads the nation with 114 Superfund sites. Some of the cuts would come from "buyouts and voluntary separation agreements" with EPA employees.

The bill also supports EPA Administrator Scott Pruitt's call to to withdraw the 2015 "Waters of the United States" rule. Adopted by the Obama administration, it expands the definition of waters subject to federal jurisdiction under the Clean Water Act.

Critics have said the rule so broadly expands EPA's authority that it would be able to regulate ditches and small bodies of water. The EPA finalized the rule in May 2015, but it has been blocked by a federal appeals court pending further legal challenges.

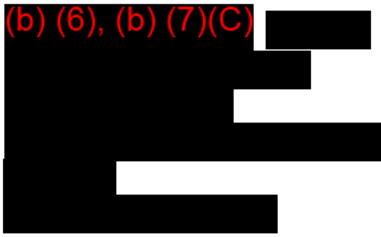
The Napp Technologies general alarm fire, April 21, 1995. (Photo: David F. Adornato/NorthJersey.com file)

The Chemical Safety Board was among several independent government bodies listed for elimination when Trump unveiled his budget proposal in March.

Since the Napp explosion, the board has been at the forefront of examining some of the worst workplace disasters in recent memory, from the Deepwater Horizon oil rig fire in 2010 to the 2013 West Fertilizer explosion in Texas that killed 15 people. In New Jersey, the board has conducted major investigations of chemical fires in Paterson, East Rutherford and Perth Amboy.

Board members and staffers have spent months lobbying for the board's survival. They received bi-partisan support from most of New Jersey's congressional delegation when six Democrats and three Republicans signed a letter in May calling for the board's budget to be fully funded.

(b) (6), (b) (7)(C)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

June 29, 2017

**MEMORANDUM**

**SUBJECT:** Office of Inspector General Hotline Complaint 2017-0309

(b) (6), (b) (7)(C)

**FROM:**

(b) (6), (b) (7)(C)

Special Agent, Hotline Manager  
Headquarters, Office of Inspector General

**TO:**

Patrick Sullivan  
Assistant Inspector General  
Office of Investigations

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline sent a Hotline Number 2017-0206, to the Office of Audit (OA) on April 30, 2017. OA has completed its review and validated the allegations of misconduct for two US Chemical Safety Board (CSB) members.

Specifically, OA reviewed information that CSB Board Members, (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), and (b) (6), (b) (7)(C), were at a government paid conference in San Antonio, Texas during the week of March 27, 2017. OA determined that two board members were engaged in grass roots lobbying during the conference. These two members are (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C). The other allegations in Hotline 2017-0206 were not substantiated.

(b) (6), (b) (7)(C), EPA, OIG, OA informed the Hotline that OA was requested by the Deputy Inspector General to refer this to the Office of Investigations (OI). OA informed the Hotline that it can provide information to OI for this investigative referral. Hotline 2017-0206 has been closed. Please inform the Hotline upon the completion of this case so that it can be closed. If you have any further questions, please call me (202) (b) (6), (b) (7)(C).

Attachment:

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, June 29, 2017 2:57 PM  
**To:** (b) (6), (b) (7)(C)  
**Cc:** (b) (6), (b) (7)(C)  
**Subject:** RE: Hotline 2017-0309 Employee- Three CSB Board Members Grass Roots Lobbying - Office of Audit Referral

I want to state something about the attached letter, particularly the paragraph in (b) (6) memo below:

Specifically, OA reviewed information that CSB Board Members, (b) (6), (b) (7)(C) were at a government paid conference in San Antonio, Texas during the week of March 27, 2017. Allegedly, the board members engaged in grass roots lobbying during the conference. In addition, the board members encourage participants to contact congress and labor union to support continue funding for the CSB. Moreover, the board members spent the majority of their time at the conference on this continued funding solicitation.

First, it is correct that (b) (6), (b) (7)(C) were at that conference in March 2017 (as were four other CSB employees). To be clear, (b) (6), (b) (7)(C) found indications that (b) (6), (b) (7)(C) primarily) and (b) (6), (b) (7)(C) potentially) may have engaged in grass roots lobbying. We did not find any indicators that (b) (6), (b) (7)(C) did. We also have no evidence that the board members spent the majority of their time at the conference on this funding lobbying.

Sincerely,

(b) (6), (b) (7)(C)

**From:** (b) (6), (b) (7)(C)  
**Sent:** Thursday, June 29, 2017 12:23 PM  
**To:** (b) (6), (b) (7)(C) @epa.gov>; (b) (6), (b) (7)(C) @epa.gov>; (b) (6), (b) (7)(C) @epa.gov>  
**Cc:** (b) (6), (b) (7)(C) @epa.gov>; (b) (6), (b) (7)(C) @epa.gov>; (b) (6), (b) (7)(C) @epa.gov>; (b) (6), (b) (7)(C) @epa.gov>  
**Subject:** Hotline 2017-0309 Employee- Three CSB Board Members Grass Roots Lobbying - Office of Audit Referral

Special Agent (b) (6), (b) (7)(C)  
Desk Officer for the EPA, OIG Hotline  
US EPA, OIG, Office of Investigations HQ  
1200 Pennsylvania Ave NW Mailcode 2431T  
Washington, DC 20460  
Voice - 202-566 (b) (6), (b) (7)(C)

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(b) (6), (b) (7)(C)

From: (b) (6), (b) (7)(C)  
Sent: Thursday, June 29, 2017 12:25 PM  
To: (b) (6), (b) (7)  
Cc: (b) (6), (b) (7)(C)  
Subject: OA REFERRAL TO OI regarding CSB and lobbying issue  
Attachments: 2017-0206 referral.pdf  
Sensitivity: Confidential

(b) (6), (b)  
(7)(C)

OA is referring the work that (b) (6), (b) (7)(C) and I did related to possible lobbying by CSB Board Members during a conference in Texas in March 2017 over to OI at the request of DiG Sheehan. The allegation that you originally sent us to look at is attached.

Based on (a) five interviews we conducted during the weeks of June 5<sup>th</sup> and June 12<sup>th</sup> (3 with CSB Board Members and 2 with staff that attended the conference in Texas in March 2017), (b) documents and an audiotape that we obtained and reviewed, and (c) a discussion with (b) (6), (b) (7)(C) and the DIG, we have concluded that the allegation had merit. We are willing to discuss and share any of the information we gathered during our research.

Sincerely,

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

Efficiency Audits  
Office of Audit  
EPA Office of Inspector General  
Dallas, TX

(b) (6), (b) (7)(C)

EPA OIG HOTLINE: <http://www.epa.gov/oig/hotline.html>  
Toll-Free: 1-888-546-8740 (Nationwide)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
INSPECTOR GENERAL

April 30, 2017

**MEMORANDUM**

**SUBJECT:** Office of Inspector General Hotline Complaint 2017-0206

(b) (6), (b) (7)(C)

**FROM:**

(b) (6), (b) (7)(C)

Special Agent, Hotline Manager  
Headquarters, Office of Inspector General

**TO:**

Kevin Christensen  
Assistant Inspector General  
Office of Audit

The Environmental Protection Agency (EPA), Office of Inspector General (OIG), Hotline received a telephone call on April 6, 2017, (b) (6), (b) (7)(C). The caller is reporting potential misconduct for three US Chemical Safety Board (CSB) members.

The caller stated that CSB Board Members, (b) (6), (b) (7)(C) and (b) (6), (b) (6), were at a government paid conference in San Antonio, Texas during the week of March 27, 2017. Allegedly, the board members engaged in grass roots lobbying during the conference. The callers stated that the board members encourage participants to contact congress and labor union to support continue funding for the CSB. In addition, (b) (6) stated that board members spent the majority of their time at the conference on this continued funding solicitation.

This referral was forwarded to the OIG, Office of Counsel. It was recommended that it be forwarded to the Office of Audit for evaluation.

I am forwarding this information for your office to review and to determine the correct response or action for the Office of Inspector General. If you have any further questions, please call me at (202) (b) (6), (b) (7)(C). Please return the attached hotline receipt within 5 business days and the course of action document within the next 30 calendar days to provide initial disposition of the complaint



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**OFFICE OF INSPECTOR GENERAL**  
1301 CONSTITUTION AVE, NW  
WASHINGTON, DC 20004

**CASE #:** COMP-2017-81

**CROSS REFERENCE #:**

**TITLE:** (b) (6), (b) (7)(C), BOARD MEMBERS, CHEMICAL SAFETY BOARD

**INTERVIEWEE (if applicable):**

**PREPARED BY:** SPECIAL AGENT (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY**  
**MEETING**

**NARRATIVE:**

On July 17, 2017, Special Agent (b) (6), (b) (7)(C) Office of Professional Responsibility, Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA), met (b) (6), (b) (7)(C) Office of Counsel, OIG, EPA, to discuss the Office of Audit's review of OIG Hotline complaint 2017-0206 (potential grassroots lobbying by U.S. Chemical Safety Board (CSB) Members (b) (6), (b) (7)(C), and (b) (6), (b) (7)(C) during a government paid conference (Global Congress on Process Safety) in March 2017. (b) (6), (b) (7)(C) was aware of the review conducted by OC and indicated (b) (6), (b) (7)(C), (b) (5)

SA (b) (6), (b) (7)(C) informed (b) (6), (b) (7)(C) that (b) (6), (b) (7)(C) would review the information provided by the Office of Audit to identify if any violations are apparent. (b) (6), (b) (7)(C), (b) (5)

On July 18, 2017, SA (b) (6), (b) (7)(C) telephonically spoke with (b) (6), (b) (7)(C) to discuss the review of information provided by OC. SA (b) (6), (b) (7)(C) informed (b) (6), (b) (7)(C) that (b) (6), (b) (7)(C) did not see any specific violations of 18 U.S.C § 1913. (b) (6), (b) (7)(C), (b) (5) (b) (6), (b) (7)(C) also informed SA (b) (6), (b) (7)(C) that (b) (6), (b) (7)(C) communicated, via email, with (b) (6), (b) (7)(C)

**CASE:** COMP-2017-81

**INTERVIEWEE (if applicable):** n/a

**DATE OF ACTIVITY:**  
17JUL2017

**DRAFTED DATE:**  
28JUL2017

**AGENT(S):**  
(b) (6), (b) (7)(C)

**RESTRICTED INFORMATION**  
Page 1 of 2

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(b) (6), (b) (7)(C), (b) (5)

[Attachment 1].

(b)

**ATTACHMENT(S):**

1. Email from (b) (6), (b) (7) (b) (5) - 18JUL2016



Email from (b)  
(b) (6), reference (b)  
(b) (7)

**CASE:** COMP-2017-81

**INTERVIEWEE** (*if applicable*): n/a

**DATE OF ACTIVITY:**  
17JUL2017

**DRAFTED DATE:**  
28JUL2017

**AGENT(S):**  
(b) (6), (b)

**RESTRICTED INFORMATION**  
Page 2 of 2

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OFFICE OF INSPECTOR GENERAL

1301 CONSTITUTION AVE, NW  
WASHINGTON, DC 20004

CASE #: COMP-2017-81

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C), BOARD MEMBERS, CHEMICAL SAFETY BOARD

INTERVIEWEE (if applicable):

PREPARED BY: SPECIAL AGENT (b) (6), (b) (7)(C)

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MEETING

NARRATIVE:

On July 17, 2017, Special Agent (b) (6), (b) (7)(C) Office of Professional Responsibility, Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA), met with (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), Office of Audit (OA), OIG, EPA, to discuss the Office of Audit's review of OIG Hotline complaint 2017-0206 (potential grassroots lobbying by U.S. Chemical Safety Board (CSB) Members (b) (6), (b) (7)(C), and (b) (6), (b) (7)(C) during a government paid conference (Global Congress on Process Safety) in March 2017. (b) (6), (b) (7)(C) indicated that during the review of the complaint by (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) OA, OIG, EPA, they telephonically interviewed five (5) employees of the CSB. Those individuals were (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), and (b) (6), (b) (7)(C), CSB. (b) (6), (b) (7)(C), (b) (6), (b) (7)(C), CSB and (b) (6), (b) (7)(C) CSB.

(b) (6), (b) (7)(C) indicated that based on answers provided during the interviews of the aforementioned individuals, as well as supporting materials, (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) came to the conclusion that Board Members (b) (6), (b) (7)(C) displayed "indications" that they engaged in grassroots lobbying during the conference. Reference the "indications," (b) (6), (b) (7)(C) stated that during interviews, it was identified that (b) (6), (b) (7)(C) spoke with vendors while at the conference. (b) (6), (b) (7)(C) continued to explain that (b) (6), (b) (7)(C) impression was

CASE: COMP-2017-81

INTERVIEWEE (if applicable): n/a

DATE OF ACTIVITY:  
17JUL2017

DRAFTED DATE:  
28JUL2017

AGENT(S):  
(b) (6), (b) (7)(C)

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Page 1 of 3

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that (b) (6), (b) (7)(C) would talk to vendors about CSB matters. (b) (6), (b) (7)(C) also stated that (b) (6), (b) (7)(C) informed individuals at the conference that (b) (6), (b) (7)(C) would be available to discuss CSB's status in regards to the upcoming federal budget, and the fact that the President wants to "dismantle" CSB (also found in audio).

SA (b) (6), (b) (7)(C) requested that (b) (6), (b) (7)(C) email all supporting documents, to include but not limited to the interview write-ups, audio from the conference, and any other relevant information. Per the request of SA (b) (6), (b) (7)(C) on July 17, 2017, (b) (6), (b) (7)(C) sent five (5) emails containing relevant information gathered during their review.

#### ATTACHMENT(S):

1. Email 1 RE\_ INFO REQUEST - Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- Revised



Email 1 RE\_ INFO  
REQUEST - Hotline 2

2. Email 2 RE\_ INFO REQUEST - Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- #2



Email 2 RE\_ INFO  
REQUEST - Hotline 2

3. Email 3 RE\_ INFO REQUEST - Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- #3



Email 3 RE\_ INFO  
REQUEST - Hotline 2

**CASE:** COMP-2017-81

**INTERVIEWEE (if applicable):** n/a

**DATE OF ACTIVITY:**  
17JUL2017

**DRAFTED DATE:**  
28JUL2017

**AGENT(S):**  
(b) (6), (b) (7)(C)

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4. Email 4 RE\_ INFO REQUEST - Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- Revised



Email 4 RE\_ INFO  
REQUEST - Hotline 2

5. Email 5 RE\_ INFO REQUEST - Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- Revised



Email 5 RE\_ INFO  
REQUEST - Hotline 2

**CASE:** COMP-2017-81

**INTERVIEWEE** (*if applicable*): n/a

**DATE OF ACTIVITY:**  
17JUL2017

**DRAFTED DATE:**  
28JUL2017

**AGENT(S):**  
(b) (6), (b) (7)(C)

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW  
WASHINGTON, DC 20004

**CASE #:** COMP-2017-81

**CROSS REFERENCE #:**

**TITLE:** (b) (6), (b) (7)(C), BOARD MEMBERS, CHEMICAL SAFETY BOARD

**INTERVIEWEE (if applicable):**

**PREPARED BY:** SPECIAL AGENT (b) (6), (b) (7)(C)

**MEMORANDUM OF ACTIVITY  
MEETING**

**NARRATIVE:**

On July 18, 2017, Special Agent (b) (6), (b) (7)(C) Office of Professional Responsibility, Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA), telephonically spoke with (b) (6), (b) (7)(C) Chemical Safety Board, to discuss the allegation of potential grassroots lobbying by U.S. Chemical Safety Board (CSB) Members (b) (6), (b) (7)(C), and (b) (6), (b) (7)(C) during a government paid conference (Global Congress on Process Safety) in March 2017. (b) (6), stated (b) (6) was "somewhat" aware of the allegation and the fact that some of the board members were interviewed by EPA OIG (Office of Audit), but did not know all the specifics. (b) (6), stated that based on the information (b) (6) knew concerning actions of board members at the conference. (b) (6), (b) (7)(C), (b) (5)

**ATTACHMENT(S):**

None

**CASE:** COMP-2017-81

**INTERVIEWEE (if applicable):** n/a

**DATE OF ACTIVITY:**  
18JUL2017

**DRAFTED DATE:**  
31JUL2017

**AGENT(S):**  
(b) (6), (b) (7)(C)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL  
1301 CONSTITUTION AVE., NW  
WASHINGTON, DC 20004

DATE: AUGUST 8, 2017

PREPARED BY: (b) (6), (b) (7)(C)

COMPLAINT #: COMP-2017-81

CROSS REFERENCE #:

TITLE: (b) (6), (b) (7)(C), BOARD MEMBERS, CHEMICAL SAFETY BOARD

COMPLAINT SUMMARY REPORT

Subject(s)	Location	Other Data
(b) (6), (b) (7)(C)	WASHINGTON, DC	

COMPLAINT:

Board Members (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) U.S. Chemical Safety Board, engaged in "grassroots lobbying" while attending a government paid conference in March 2017, violating 18 U.S.C § 1913: Lobbying with appropriated funds.

BACKGROUND:

On July 12, 2017, (b) (6), (b) (7)(C), Office of Professional Responsibility (OPR), Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA) provided, via email, Special Agent (b) (6), (b) (7)(C), OPR, OI, OIG, EPA, with OIG Hotline complaint 2017-0309. The complaint reported potential employee misconduct by (b) (6), and (b) (6), (b) (7)(C). Specifically, the complaint alleged that Board Members (b) (6), and (b) (6), (b) (7)(C) engaged in "grassroots lobbying" while attending a government paid conference in March 2017.

SUMMARY:

Based on information received from the Office of Audit, OIG, EPA, as well as additional information independently obtained during the review of the complaint, it was identified that during the week of March 27, 2017, CSB board members (b) (6), (b) (7)(C) and Board Member, CSB, (b) (6), (b) (7)(C) in addition to (b) (6), (b) (7)(C), CSB, and (b) (6), (b) (7)(C), CSB, attended the Global Congress on Process Safety conference located in San Antonio, Texas. The CSB funded the attendance of the aforementioned individuals. During the conference, it was alleged that (b) (6), and (b) (6), (b) (7)(C) were engaged in grassroots lobbying. Specifically, it was alleged that (b) (6), (b) (7)(C) spoke with vendors while at the conference, and one (1) CSB employee was under the impression that (b) (6), (b) (7)(C) would talk to vendors about CSB

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matters. It was also alleged that (b) (6), informed individuals at the conference that (b) (6) would be available to discuss CSB's status in regards to the upcoming federal budget, and the fact that the U.S. President wants to "dismantle" CSB.

Based on the information provided, the case agent discussed the facts of the complaint to the Office of Counsel, OIG, EPA and the designated ethics official of the CSB. Both indicated that the facts did not support violations of 18 U.S.C § 1913, nor did their actions constitute actual grassroots lobbying. It was noted that because CSB board members are Presidential Appointees they are permitted to lobby, but not grassroots lobbying.

#### **DISPOSITION:**

Based upon the foregoing investigatory steps, and at the direction of the Assistant Inspector General for Investigations (AIGI), this complaint will be closed and no further investigative steps will be taken. Per the AIGI, the complaint will be referred back to the OIG Hotline, who will then refer the matter to the U.S. Office of Special Counsel.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL**

1301 CONSTITUTION AVE, NW  
WASHINGTON, DC 20004

**CASE #:** COMP-2017-81

**CROSS REFERENCE #:** 2017-0309

**TITLE:** (b) (6), (b) (7)(C), BOARD MEMBERS, CHEMICAL SAFETY BOARD

**CASE AGENT (if different from prepared):** SPECIAL AGENT (b) (6), (b) (7)(C)

**COMPLAINT INITIATION**

Subject(s)	Location	Other Data
(b) (6), (b) (7)(C)	Washington, DC	Board Members for the Chemical Safety Board

**NARRATIVE:**

On July 12, 2017, (b) (6), (b) (7)(C), Office of Professional Responsibility (OPR), Office of Investigations (OI), Office of Inspector General (OIG), U.S. Environmental Protection Agency (EPA) provided, via email, Special Agent (b) (6), (b) (7)(C) EPA, with OIG Hotline complaint 2017-0309 [Attachment 1]. The complaint reported potential employee misconduct by (b) (6), (b) (7)(C) Board Member, U.S. Chemical Safety Board (CSB), and (b) (6), (b) (7)(C) Board Member, CSB. Specifically, the complaint alleged that Board Members (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) engaged in “grassroots lobbying” while attending a government paid conference in March 2017.

As background, the OIG Office of Audit (OA) conducted a review into a OIG hotline complaint (2017-0206) which alleged CSB Board Members engaged in “grassroots lobbying”, during a government paid conference in San Antonio, Texas during the week of March 27, 2017. Specifically, OA informed the hotline that they found “indications” that CSB Board Members (b) (6), and (b) (6), (b) (7)(C) engaged in the lobbying. Because of the indications posed by OA, the complaint was referred to OI to identify if there was any criminal and/or administrative violations.

**CASE #:** COMP-2017-81

**PREPARED BY:** Special Agent (b) (6), (b) (7)(C)

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**Action by OPR:** OPR will be consulting with the Office of Audit and (b) (6), (b) (7)(C) Office of Counsel, OIG, EPA to get additional details, to include OA's report and supporting documents, in order to assess whether there is an allegation appropriate for an OPR investigation.

*Agent's Note:* On July 23, 2017, Special Agent (b) (6), (b) (7)(C) OIG Hotline Manager, OI, OIG, EPA, provided a corrected Hotline complaint document, with the corrected hotline number for this complaint [Attachment 2].

**ATTACHMENT(S):**

1. FW\_Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- With Attachments



FW\_Hotline  
2017-0309- Grass Ro

2. Corrected - FW\_Hotline 2017-0309- Grass Roots Lobbying by two CSB Board Members- With Attachments



Corrected - FW\_  
Hotline 2017-0309- (

**CASE #:** COMP-2017-81

**PREPARED BY:** Special Agent (b) (6), (b) (7)(C)

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